

## **EXHIBIT E**

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17 Inc.

18 UNITED STATES DISTRICT COURT  
19 NORTHERN DISTRICT OF CALIFORNIA

20 All Nippon Airways Company, Ltd.,

21 Case No.07-03422 EDL

22 Plaintiff,

23 **RESPONSES TO ALL NIPPON AIRWAYS  
24 COMPANY, LTD.'S SECOND SET OF  
25 DOCUMENT REQUESTS TO UNITED  
26 AIRLINES, INC.**

27 vs.

28 United Air Lines, Inc.,

29 -DATE:  
30 TIME:  
31 CTRM:  
32 JUDGE:  
33

34 COMES NOW, Defendant United Air Lines, Inc., by and through its attorneys, Jaffe  
35 Raitt Heuer & Weiss, P.C., and responds to Plaintiff All Nippon Airways Company, Ltd.'s  
36 Second Set of Documents Requests as follows:

**DOCUMENT REQUESTS**

1           **REQUEST NO. 1:**

2           True and correct copies of all documents concerning the Ramp Tower G Ramp Controller  
3 position at SFO in effect on October 7, 2003 regarding (i) communications with aircraft; (ii)  
4 clearances and instructions for pushback and taxi; (iii) traffic advisories and safety alerts; (iv)  
5 maintaining separation of aircraft in the vicinity of Terminal G; (v) ensuring that no collisions  
6 occur between aircraft; (vi) organizing and expediting the flow of traffic; (vii) paying attention to  
7 all aircraft and not focusing on one area to the exclusion of another; (viii) clearing potential  
8 conflicts between aircraft prior to or during taxi; (ix) clearing potential conflicts between aircraft  
9 prior to or during pushback; and (x) conflict resolution.

10           **RESPONSE:**

11           Objection: Overly broad and unduly burdensome. Subject to, and without waiving, these  
12 objections, United has produced the Ramp Service Driving Rules as bates numbers UAL 000355  
13 - UAL 000371, and the Maintenance Manual Handling document as bates numbers UAL 000303  
14 - UAL 000354. Also, United will produce a copy of the flight manual and flight operations  
15 manual to Plaintiff.

16           **REQUEST NO. 2:**

17           True and correct copies of the training materials and records for Edward Loh, including,  
18 but not limited to, all documents regarding the training of Edward Loh for his position as Ramp  
19 Tower G Ramp Controller at SFO in effect on or before October 7, 2003.

20           **RESPONSE:**

21           Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior  
22 document requests, including, but not limited to, plaintiff's request for Edward Loh's personnel  
23 and training records in its First Set of Document Requests. Additionally, the phrase "in effect" is  
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1 objectionably confusing and vague. And, to the extent this document request seeks documents  
2 contained in personnel files, it seeks private information protected under California law, which  
3 cannot be produced without permission of the individual whose files are being requested. This  
4 request is also objectionable to the extent that it seeks information protected by the "self-critical  
5 analysis" privilege. *See Dowling v. American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th  
6 Cir. 1992).

7 Subject to, and without waiving, these objections, United has produced the non-  
8 personal/non-medical portions of Edward Loh's personnel file as confidential bates range  
9 documents UAL 000372 - UAL 000480.

10 **REQUEST NO. 3:**

11 True and correct copies of all documents reflecting the training of Edward Loh for his  
12 position as Ramp Tower G Ramp Controller at SFO received on or before October 7, 2003 from  
13 (i) UAL; (ii) the Federal Aviation Authority; and (iii) San Francisco Terminal Equipment Co.

14 **RESPONSE:**

15 Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior  
16 document requests, including, but not limited to, plaintiff's request for Edward Loh's personnel  
17 and training records in its First Set of Document Requests. Additionally, this document request  
18 plainly seeks documentation from sources that are not within United's influence and/or control.  
19 And, to the extent this document request seeks documents contained in personnel files, it seeks  
20 private information protected under California law, which cannot be produced without  
21 permission of the individual whose files are being requested. This request is also objectionable  
22 to the extent that it seeks information protected by the "self-critical analysis" privilege. *See*  
23 *Dowling v. American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

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1                   Subject to, and without waiving, these objections, United has produced the non-  
2 personal/non-medical portions of Edward Loh's personnel file as confidential bates range  
3 documents UAL 000372 - UAL 000480.

4 **REQUEST NO. 4:**

5                   True and correct copies of the training materials and records for John Rediger, including,  
6 but not limited to, all documents concerning (i) clearing potential conflicts with other aircraft  
7 prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or during  
8 pushback; (iii) conflict resolution; (iv) wing growth; (v) taxiing; and (vi) determination of Pilot  
9 Flying.

10 **RESPONSE:**

11                   Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior  
12 document requests, including, but not limited to, plaintiff's request for John Rediger's personnel  
13 and training records in its First Set of Document Requests. And, to the extent this document  
14 request seeks documents contained in personnel files, it seeks private information protected  
15 under California law, which cannot be produced without permission of the individual whose files  
16 are being requested. This request is also objectionable to the extent that it seeks information  
17 protected by the "self-critical analysis" privilege. *See Dowling v. American Hawaii Cruises,*  
18 *Inc*, 971 F.2d 423, 425-26 (9th Cir. 1992).

19                   Subject to, and without waiving, these objections, United has produced the non-  
20 personal/non-medical portions of John Rediger's personnel file as confidential bates range  
21 documents UAL 000119 - UAL 000215.

1           REQUEST NO. 5:

2           True and correct copies of the training materials and records for Scott M. Russell,  
3 including, but not limited to, all documents concerning (i) clearing potential conflicts with other  
4 aircraft prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or  
5 during pushback; (iii) conflict resolution; (iv) wing growth; (v) taxiing; and (vi) determination of  
6 Pilot Flying.

7           RESPONSE:

8           Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior  
9 document requests, including, but not limited to, plaintiff's request for Scott M. Russell's  
10 personnel and training records in its First Set of Document Requests. And, to the extent this  
11 document request seeks documents contained in personnel files, it seeks private information  
12 protected under California law, which cannot be produced without permission of the individual  
13 whose files are being requested. This request is also objectionable to the extent that it seeks  
14 information protected by the "self-critical analysis" privilege. *See Dowling v American Hawaii*  
15 *Cruises, Inc*, 971 F.2d 423, 425-26 (9th Cir. 1992).

16           Subject to, and without waiving, these objections, United has produced the non-  
17 personal/non-medical portions of Scott M. Russell's personnel file as confidential bates range  
18 documents UAL 000001 - UAL 000118.

19           REQUEST NO. 6:

20           True and correct copies of the training materials and records for Brad Powell, including,  
21 but not limited to, all documents concerning (i) clearing potential conflicts with other aircraft  
22 prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or during  
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1 pushback; (iii) conflict resolution; (iv) wing growth; (v) taxiing; and (vi) determination of Pilot  
2 Flying.

3 **RESPONSE:**

4 Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior  
5 document requests, including, but not limited to, plaintiff's request for Brad Powell's personnel  
6 and training records in its First Set of Document Requests. And, to the extent this document  
7 request seeks documents contained in personnel files, it seeks private information protected  
8 under California law, which cannot be produced without permission of the individual whose files  
9 are being requested. This request is also objectionable to the extent that it seeks information  
10 protected by the "self-critical analysis" privilege. *See Dowling v American Hawaii Cruises,*  
11 *Inc*, 971 F.2d 423, 425-26 (9th Cir. 1992).

12 Subject to, and without waiving, these objections, United has produced the non-  
13 personal/non-medical portions of Bradley Powell's personnel file as confidential bates range  
14 documents UAL 000216 - UAL 000302.  
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16 **REQUEST NO. 7:**

17 True and correct copies of the training materials and records for Julio Hernandez,  
18 including, but not limited to, all documents concerning (i) pushback procedures; (ii)  
19 responsibility for safe dispatch and clearance; (iii) determination of number and position of wing  
20 walkers during pushback; (iv) maintaining safety clearance for aircraft movement; (v) stopping  
21 pushback when there is a question about clearance; (vi) clearing potential conflicts with other  
22 aircraft prior to or during pushback; (vii) conflict resolution; and (viii) wing growth.  
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RESPONSE:

1 Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior  
 2 document requests, including, but not limited to, plaintiff's request for Julio Hernandez's  
 3 personnel and training records in its First Set of Document Requests. And, to the extent this  
 4 document request seeks documents contained in personnel files, it seeks private information  
 5 protected under California law, which cannot be produced without permission of the individual  
 6 whose files are being requested. This request is also objectionable to the extent that it seeks  
 7 information protected by the "self-critical analysis" privilege. *See Dowling v. American Hawaii*  
 8 *Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

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 10 Subject to, and without waiving, these objections, United has produced the non-  
 11 personal/non-medical portions of Julio Hernandez's personnel file as confidential bates range  
 12 documents UAL 000481 - UAL 000547.

REQUEST NO. 8:

13 True and correct copies of any and all documents reflecting UAL's policies, procedures,  
 14 and operations in effect on October 7, 2003 concerning (i) clearing potential conflicts with other  
 15 aircraft prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or  
 16 during pushback; (iii) conflict resolution; (iv) wing growth; (v) taxiing; (vi) determination of  
 17 Pilot Flying; (vii) determination of number and position of wing walkers during pushback; and  
 18 (viii) Ramp Tower G Ramp Controller procedures prior to, during, and after issuance of  
 19 clearance to push, clearance to taxi, and clearance to Spot 10 instructions.

RESPONSE:

20 Objection: Overly broad and unduly burdensome. Subject to, and without waiving, these  
 21 objections, United has produced the Ramp Service Driving Rules as bates numbers UAL 000355  
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1 - UAL 000371, and the Maintenance Manual Handling document as bates numbers UAL 000303  
2 - UAL 000354. Also, United will produce a copy of the flight manual and flight operations  
3 manual to Plaintiff.

4 **REQUEST NO. 9:**

5 True and correct copies of any and all documents reflecting UAL's policies, procedures,  
6 and operations currently in effect concerning (i) clearing potential conflicts with other aircraft  
7 prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or during  
8 pushback; (iii) conflict resolution; (iv) wing growth; (v) taxiing; (vi) determination of Pilot  
9 Flying; (vii) determination of number and position of wing walkers during pushback; and (viii)  
10 Ramp Tower G Ramp Controller procedures prior to, during, and after issuance of clearance to  
11 push, clearance to taxi, and clearance to Spot 10 instructions.  
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13 **RESPONSE:**

14 Objection: Overly broad and unduly burdensome. Subject to, and without waiving, these  
15 objections, United has produced the Ramp Service Driving Rules as bates numbers UAL 000355  
16 - UAL 000371, and the Maintenance Manual Handling document as bates numbers UAL 000303  
17 - UAL 000354. Also, United will produce a copy of the flight manual and flight operations  
18 manual to Plaintiff.

20 **REQUEST NO. 10:**

21 True and correct copies of any and all documents reflecting changes in UAL's policies,  
22 procedures, and operations after October 7, 2003 concerning (i) clearing potential conflicts with  
23 other aircraft prior to or during taxi; (ii) clearing potential conflicts with other aircraft prior to or  
24 during pushback; (iii) conflict resolution; (iv) wing growth; (v) taxiing; (vi) determination of  
25 Pilot Flying; (vii) determination of number and position of wing walkers during pushback; and  
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1 (viii) Ramp Tower G Ramp Controller procedures prior to, during, and after issuance of  
2 clearance to push, clearance to taxi, and clearance to Spot 10 instructions.

3 **RESPONSE:**

4 Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior  
5 document requests. Additionally, this document request potentially seeks materials privileged  
6 under the attorney-client privilege and/or work-product doctrine. This request is also  
7 objectionable to the extent that it seeks information protected by the "self-critical analysis"  
8 privilege. *See Dowling v American Hawaii Cruises, Inc*, 971 F.2d 423, 425-26 (9th Cir. 1992).

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10 Subject to, and without waiving, these objections, United has not located any documents  
11 responsive to this Request.

12 **REQUEST NO. 11:**

13 A true and correct copy of the UAL operations manual in effect on October 7, 2003 and  
14 applicable to the UAL aircraft involved in the Accident.

15 **RESPONSE:**

16 Objection: Overly broad, unduly burdensome, and duplicative of prior document  
17 requests. Subject to, and without waiving, these objections, United will produce a copy of the  
18 flight operations manual to Plaintiff.

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20 **REQUEST NO. 12:**

21 A true and correct copy of the current UAL operations manual applicable to its B777  
22 aircraft.

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1           **RESPONSE:**

2           Objection: Overly broad, unduly burdensome, and duplicative of prior document  
3 requests. Subject to, and without waiving, these objections, United will produce a copy of the  
4 flight operations manual to Plaintiff.

5           **REQUEST NO. 13:**

6           True and correct copies of any and all documents reflecting changes in the UAL  
7 operations manual applicable to ground operations of its B777 aircraft after October 7, 2003.  
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9           **RESPONSE:**

10           Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document  
11 requests. Additionally, this document request potentially seeks materials privileged under the  
12 attorney-client privilege and/or work-product doctrine. This request is also objectionable to the  
13 extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v.*  
14 *American Hawaii Cruises, Inc*, 971 F.2d 423, 425-26 (9th Cir. 1992).

15           Subject to, and without waiving, these objections, United has not located any documents  
16 responsive to this Request.  
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18           **REQUEST NO. 14:**

19           True and correct copies of any and all documents which UAL and/or its flight crew was  
20 required to have on board Flight UA809 at the time of the Accident.

21           **RESPONSE:**

22           Objection: Vague, overly broad and unduly burdensome. Subject to, and without  
23 waiving, these objections, United has produced the Ramp Service Driving Rules as bates  
24 numbers UAL 000355 - UAL 000371, and the Maintenance Manual Handling document as bates  
25 numbers UAL 000355 - UAL 000371, and the Maintenance Manual Handling document as bates  
26 numbers UAL 000355 - UAL 000371, and the Maintenance Manual Handling document as bates  
27 numbers UAL 000355 - UAL 000371, and the Maintenance Manual Handling document as bates  
28 numbers UAL 000355 - UAL 000371, and the Maintenance Manual Handling document as bates

1 numbers UAL 000303 - UAL 000354. Also, United will produce a copy of the flight manual  
2 and flight operations manual to Plaintiff.

3 **REQUEST NO. 15:**

4 True and correct copies of any and all documents regarding pushback and taxi operations  
5 of UAL B777 aircraft into and out of SFO in effect at the time of the Accident.

6 **RESPONSE:**

7 Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document  
8 requests. Additionally, this document request potentially seeks materials privileged under the  
9 attorney-client privilege and/or work-product doctrine. This request is also objectionable to the  
10 extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v.*  
11 *American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992). Subject to, and without  
12 waiving, these objections, United has produced the Ramp Service Driving Rules as bates  
13 numbers UAL 000355 - UAL 000371, and the Maintenance Manual Handling document as bates  
14 numbers UAL 000303 - UAL 000354. Also, United will produce a copy of the flight manual  
15 and flight operations manual to Plaintiff.

16 **REQUEST NO. 16:**

17 True and correct copies of any and all documents regarding pushback and taxi operations  
18 of UAL B777 aircraft into and out of SFO in effect at the present time.

19 **RESPONSE:**

20 Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document  
21 requests. Additionally, this document request potentially seeks materials privileged under the  
22 attorney-client privilege and/or work-product doctrine. This request is also objectionable to the  
23 extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v.*  
24 *American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992). Subject to, and without  
25 waiving, these objections, United has produced the Ramp Service Driving Rules as bates  
26 numbers UAL 000355 - UAL 000371, and the Maintenance Manual Handling document as bates  
27 numbers UAL 000303 - UAL 000354. Also, United will produce a copy of the flight manual  
28 and flight operations manual to Plaintiff.

1           *American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992). Subject to, and without  
2 waiving, these objections, United has produced the Ramp Service Driving Rules as bates  
3 numbers UAL 000355 - UAL 000371, and the Maintenance Manual Handling document as bates  
4 numbers UAL 000303 - UAL 000354. Also, United will produce a copy of the flight manual  
5 and flight operations manual to Plaintiff.

6           **REQUEST NO. 17:**

7           True and correct copies of any and all documents reflecting changes in pushback and taxi  
8 operations of UAL B777 aircraft after October 7, 2003.  
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10           **RESPONSE:**

11           Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document  
12 requests. Additionally, this document request potentially seeks materials privileged under the  
13 attorney-client privilege and/or work-product doctrine. This request is also objectionable to the  
14 extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v.*  
15 *American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

16           Subject to, and without waiving, these objections, United has not located any documents  
17 responsive to this Request.  
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19           **REQUEST NO. 18:**

20           True and correct copies of all documents reflecting UAL's policies, procedures, and  
21 operations in effect on October 7, 2003 concerning (i) pushback procedures; (ii) responsibility  
22 for safe dispatch and clearance; (iii) determination of number and position of wing walkers  
23 during pushback; (iv) maintaining safety clearance for aircraft movement; (v) stopping pushback  
24 when there is a question about clearance; (vi) clearing potential conflicts with other aircraft prior  
25 to or during pushback; (vii) conflict resolution; and (viii) wing growth.

**RESPONSE:**

1 Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior  
 2 document requests. Additionally, this document request potentially seeks materials privileged  
 3 under the attorney-client privilege and/or work-product doctrine. This request is also  
 4 objectionable to the extent that it seeks information protected by the "self-critical analysis"  
 5 privilege. *See Dowling v American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).  
 6 Subject to, and without waiving, these objections, United has produced the Ramp Service  
 7 Driving Rules as bates numbers UAL 000355 - UAL 000371, and the Maintenance Manual  
 8 Handling document as bates numbers UAL 000303 - UAL 000354. Also, United will produce a  
 9 copy of the flight manual and flight operations manual to Plaintiff.  
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**REQUEST NO. 19:**

13 True and correct copies of all documents reflecting UAL's policies, procedures, and  
 14 operations currently in effect concerning (i) pushback procedures; (ii) responsibility for safe  
 15 dispatch and clearance; (iii) determination of number and position of wing walkers during  
 16 pushback; (iv) maintaining safety clearance for aircraft movement; (v) stopping pushback when  
 17 there is a question about clearance; (vi) clearing potential conflicts with other aircraft prior to or  
 18 during pushback; (vii) conflict resolution; and (viii) wing growth.  
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**RESPONSE:**

21 Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior  
 22 document requests. Additionally, this document request potentially seeks materials privileged  
 23 under the attorney-client privilege and/or work-product doctrine. This request is also  
 24 objectionable to the extent that it seeks information protected by the "self-critical analysis"  
 25 privilege. *See Dowling v American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).  
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1 Subject to, and without waiving, these objections, United has produced the Ramp Service  
2 Driving Rules as bates numbers UAL 000355 - UAL 000371, and the Maintenance Manual  
3 Handling document as bates numbers UAL 000303 - UAL 000354. Also, United will produce a  
4 copy of the flight manual and flight operations manual to Plaintiff.

5 **REQUEST NO. 20:**

6 True and correct copies of all documents reflecting changes in UAL's policies,  
7 procedures, and operations after October 7, 2003 concerning (i) pushback procedures; (ii)  
8 responsibility for safe dispatch and clearance; (iii) determination of number and position of wing  
9 walkers during pushback; (iv) maintaining safety clearance for aircraft movement; (v) stopping  
10 pushback when there is a question about clearance; (vi) clearing potential conflicts with other  
11 aircraft prior to or during pushback; (vii) conflict resolution; and (viii) wing growth

12 **RESPONSE:**

13 Objection: Vague, overly broad, unduly burdensome, compound, and duplicative of prior  
14 document requests. Additionally, this document request potentially seeks materials privileged  
15 under the attorney-client privilege and/or work-product doctrine. This request is also  
16 objectionable to the extent that it seeks information protected by the "self-critical analysis"  
17 privilege. *See Dowling v. American Hawaii Cruises, Inc*, 971 F.2d 424, 425-26 (9th Cir. 1992).

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20 Subject to, and without waiving, these objections, United has not located any documents  
21 responsive to this Request.

22 **REQUEST NO. 21:**

23 True and correct copies of all documents reflecting the results and/or records of all  
24 checks and tests conducted on Julio Hernandez for fitness for duty at the time of the Accident.  
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1           **RESPONSE:**

2           Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document  
3 requests, including, but not limited to, plaintiff's request for Julio Hernandez's personnel and  
4 training records in its First Set of Document Requests. And, to the extent this document request  
5 seeks documents contained in personnel files, it seeks private information protected under  
6 California law, which cannot be produced without permission of the individual whose files are  
7 being requested.

8           Subject to, and without waiving, these objections, United has produced the non-  
9 personal/non-medical portions of Julio Hernandez's personnel file as confidential bates range  
10 documents UAL 000481 - UAL 000547.

12           **REQUEST NO. 22:**

13           True and correct copies of all documents reflecting procedures and policies concerning  
14 the Ramp Tower G Ramp Controller position at SFO in effect on October 7, 2003.

16           **RESPONSE:**

17           Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document  
18 requests. Additionally, this document request potentially seeks materials privileged under the  
19 attorney-client privilege and/or work-product doctrine. This request is also objectionable to the  
20 extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v.*  
21 *American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

22           Subject to, and without waiving, these objections, United has not located any documents  
23 responsive to this Request.

1           REQUEST NO. 23:

2           True and correct copies of all documents reflecting procedures and policies concerning  
3           the Ramp Tower G Ramp Controller position at SFO currently in effect.

4           RESPONSE:

5           Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document  
6           requests. Additionally, this document request potentially seeks materials privileged under the  
7           attorney-client privilege and/or work-product doctrine. This request is also objectionable to the  
8           extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v.*  
9           *American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992)

10           Subject to, and without waiving, these objections, United has not located any documents  
11           responsive to this Request.

12           REQUEST NO. 24:

13           True and correct copies of all documents reflecting changes to procedures and policies  
14           concerning the Ramp Tower G Ramp Controller position at SFO from October 7, 2003 to  
15           present.

16           RESPONSE:

17           Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document  
18           requests. Additionally, this document request potentially seeks materials privileged under the  
19           attorney-client privilege and/or work-product doctrine. This request is also objectionable to the  
20           extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v.*  
21           *American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

22           Subject to, and without waiving, these objections, United has not located any documents  
23           responsive to this Request.

1           REQUEST NO. 25:

2           True and correct copies of all documents reflecting procedures and policies concerning  
3           the operation of Ramp Tower G at SFO in effect on October 7, 2003.

4           RESPONSE:

5           Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document  
6           requests. Additionally, this document request potentially seeks materials privileged under the  
7           attorney-client privilege and/or work-product doctrine. This request is also objectionable to the  
8           extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v.*  
9           *American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

10           Subject to, and without waiving, these objections, United has not located any documents  
11           responsive to this Request.

12           REQUEST NO. 26:

13           True and correct copies of all documents reflecting procedures and policies concerning  
14           the operation of Ramp Tower G at SFO in effect on October 7, 2003.

15           RESPONSE:

16           Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document  
17           requests. Additionally, this document request potentially seeks materials privileged under the  
18           attorney-client privilege and/or work-product doctrine. This request is also objectionable to the  
19           extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v.*  
20           *American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

21           Subject to, and without waiving, these objections, United has not located any documents  
22           responsive to this Request.

**REQUEST NO. 27:**

True and correct copies of all documents reflecting changes to procedures and policies concerning the operation of Ramp Tower G at SFO from October 7, 2003 to present.

**RESPONSE:**

Objection: Vague, overly broad, unduly burdensome, and duplicative of prior document requests. Additionally, this document request potentially seeks materials privileged under the attorney-client privilege and/or work-product doctrine. This request is also objectionable to the extent that it seeks information protected by the "self-critical analysis" privilege. *See Dowling v. American Hawaii Cruises, Inc.*, 971 F.2d 423, 425-26 (9th Cir. 1992).

Subject to, and without waiving, these objections, United has not located any documents responsive to this Request.

**REQUEST NO. 28:**

True and correct copies of all Jeppesen charts applicable to ground operations of UAL B777 aircraft at SFO in effect on the date of the Accident.

**RESPONSE:**

Objection: Vague, overly broad, and unduly burdensome.

Subject to, and without waiving, these objections, United states that these documents are covered under Copyright protection as stated in the United Airlines Flight Manual.

**REQUEST NO. 29:**

True and correct copies of all Jeppesen charts applicable to ground operations of UAL B777 aircraft at SFO in effect at present.

**RESPONSE:**

Objection: Vague, overly broad, and unduly burdensome.

1           Subject to, and without waiving, these objections, United states that these documents are  
2 covered under Copyright protection as stated in the United Airlines Flight Manual.

3 **REQUEST NO. 30:**

4           True and correct copies of all dispatch documents for Flight UA809 on October 7, 2003,  
5 including but not limited to (i) flight plan; and (ii) assigned altitude.

6 **RESPONSE:**

7           Objection: Vague, overly broad, compound, and unduly burdensome.

8           Subject to, and without waiving, these objections, United has not located any documents  
9 responsive to this Request.

10 **REQUEST NO. 31:**

11           Attach true and correct copies of any and all documents reflecting the requested and/or  
12 assigned routing for Flight UA809 on October 7, 2003

13 **RESPONSE:**

14           Objection: Vague, overly broad, compound, and unduly burdensome.

15           Subject to, and without waiving, these objections, United has not located any documents  
16 responsive to this Request.

Respectfully submitted,

JAFFE, RAITT, HEUER & WEISS, P.C.

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Dated: January 16, 2008

Attorneys for Defendant United Air Lines, Inc.

**CERTIFICATE OF SERVICE**

Phyllis L. Nelson certifies that she is an employee of Jaffe, Raitt, Heuer & Weiss, P.C. and that on January 16, 2008 she caused to be served Responses to All Nippoin Airways Company, Ltd's Second Set of Document Requests to United Airlines, Inc. on the person(s) listed below by placing said document(s) in a sealed envelope (if applicable), properly addressed, and forwarding same by the method(s) indicated.

*By Email and First Class Mail*  
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Dated: January 16, 2008

Phyllis Nelson

Phyllis L. Nelson